

Alexander F. Giovanniello (CSB # 125562)  
Joseph M. Lorant (CSB# 327731)  
**GIOVANNIELLO LAW GROUP**  
Six Pointe Drive, Suite 520  
Brea, California 92821

Ph: (714) 364-4000  
Fax: (714) 364-4001

Attorneys for Defendant:  
DESERT VALLEY HOSPITAL, LLC dba  
DESERT VALLEY HOSPITAL

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

COLLEEN MANGHANE; and	)	Case No.: 5:25-cv-01107 JGB (DTBx)
ROBERT MANGHANE,	)	
	)	Related Case No.: 5:25-cv-00140-
	)	WLH-SHK
Plaintiffs,	)	
	)	DECLARATION OF TRIAL
vs.	)	COUNSEL BY DEFENDANT
	)	DESERT VALLEY HOSPITAL, LLC
COUNTY OF SAN BERNARDINO;	)	dba DESERT VALLEY HOSPITAL
SHANNON D. DICUS; DESERT	)	
VALLEY HOSPITAL; and DOES 1-	)	
15, inclusive.	)	
	)	JUDGE: Jesus G. Bernal
Defendants.	)	
	)	Complaint filed May 29, 2025
	)	
	)	Trial Scheduled: None
	)	

I, Alexander F. Giovanniello, declare and state as follows:

1. I am an attorney at law duly licensed to practice before all of the courts of the State of California, as well as the Central District of the United States District Courts, and am the principal in the law firm of Giovanniello Law Group.

1           2.     That when this matter was assigned to this law firm, it was assigned  
2 to me for all purposes, including trial, and that I and no other attorney in this firm  
3 is capable and available to try the case and/or could be prepared to do so.

4           3.     That Defendant DESERT VALLEY HOSPITAL, LLC dba DESERT  
5 VALLEY HOSPITAL (hereinafter referred to as “Desert Valley Hospital”),  
6 specifically requested that I, Alexander F. Giovanniello, be its trial attorney and  
7 will consent to no other attorney.

8           4.     Desert Valley Hospital does not waive the right to submit this matter  
9 to and/or compel binding arbitration in accordance with the terms of any relevant  
10 arbitration agreement.

11           I declare under penalty of perjury, under the laws of the State of California,  
12 that the foregoing is true and correct and that I executed this declaration on June  
13 12, 2025, in Brea, California.

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Alexander F. Giovanniello, Declarant

**PROOF OF SERVICE**

I am employed in the county of Orange, State of California. I am over the age of eighteen and not a party to the within entitled action; my business address is Six Pointe Drive, Suite 520 Brea, California 92821.

On **June 12, 2025**, I served the foregoing document(s) described as, **DECLARATION OF TRIAL COUNSEL BY DEFENDANT DESERT VALLEY HOSPITAL, LLC dba DESERT VALLEY HOSPITAL**, as follows:

*See below service list*

( ) BY U.S. MAIL: I am “readily familiar” with the business practice for collection and processing of correspondence for mailing with the United States Postal Service. Under that practice the envelope was sealed and placed for collection and mailing with the United States Postal Service on that same day with postage thereon fully prepaid at Brea, California following ordinary business practices.

( ) BY FEDERAL EXPRESS OVERNIGHT: I placed said envelope(s) for collection and overnight delivery at a regularly utilized drop box of the overnight delivery carrier.

(XX) BY ELECTRONIC SERVICE: I caused the document(s) to be sent from [kks@giolawgroup.com](mailto:kks@giolawgroup.com) to the person(s) at the electronic notification addresses indicated on the service list.

Executed on **June 12, 2025** at Brea, California.

(XX) STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

  
Kristy K. Shimotani

1 SERVICE LIST

2

3 Dale K. Galipo

*Counsel for Plaintiffs*

4 Marcel F. Sincich

5 LAW OFFICES OF DALE K. GALIPO

6 21800 Burbank Boulevard, Suite 310

7 Woodland Hills, CA 91367

8 Tel: (818) 347-3333

9 Fax: (818) 347-4118

10 Email: [msincich@galipolaw.com](mailto:msincich@galipolaw.com)

11 Email: [dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)

12

13 Edward Southcott, Jr.

*Counsel for Defendant, County of San*

14 Shannon Gustafson

*Bernardino and Shannon D Dicus, Sheriff*

15 LYNBERG AND WATKINS

16 1100 WestTown and Country Road, Suite 1450

17 Orange, CA 92868

18 Tel: (714) 937-1010

19 Fax: (714) 937-1003

20 Email: [esouthcott@lynberg.com](mailto:esouthcott@lynberg.com)

21 Email: [sgustafson@lynberg.com](mailto:sgustafson@lynberg.com)

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